

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION**

ANCHOR HEALTH SYSTEMS, INC.)

Plaintiff)

Vs.)

CASE NO. 2:16-CV-00065

DENNIS RADOWSKI & THE CITY OF)
OF HAMMOND & PROFESSIONAL)
CLAIMS MANAGEMENT, INC. &)
UNITED FOOD & COMMERCIAL)
WORKERS & EMPLOYERS CALUMET)
AND REGION INSURANCE FUND)

Defendants)

Amended Notice Of Deposition Pursuant to FRCP 30(b)(6)

To: Joseph Torres
Jonathan Karmel
Karmel Law Firm
221 N LaSalle Street, Suite 1550
Chicago, IL 60602

PLEASE TAKE NOTICE that the plaintiff by counsel intends to take the deposition of the United Food & Commercial Workers & Employers Calumet & Region Insurance Fund upon oral examination of United Food & Commercial Workers & Employers Calumet Region Insurance Fund ("Calumet Fund") through their designated agent(s). Pursuant to the provisions of Rule 30(b)(6) Calumet Fund is hereby directed to designate one or more officers, directors, managing agents, or other person who consent to testify and are most knowledgeable and competent to testify regarding the matters designated below. The deposition will take place at the offices of Jonathan Karmel, Karmel Law Office, 221 N La Salle Street, Suite 1550, Chicago, Illinois 60602 on the 27th day of June , 2018 beginning at 1:00 p.m.



CSTS and said examination to occur before a court reporter authorized to administer oaths. The Calumet Fund is directed to designate each said person(s) and the subject matter for each witness. All parties are invited to attend and question the witness.

Respectfully submitted

/s/Jonathan R O'Hara
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the attached document was electronically mailed and by 1st class mail to all of the following persons on June 16, 2018.

/s/Jonathan R O'Hara
Attorney for Plaintiff

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221 N LaSalle St Ste 2950
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Exhibit "A"

1. Communication between Calumet Fund and Dennis Radowski and/or a representative of Dennis Radowski with regard to processing of claim involving Grace Radowski.
2. Communication between Calumet Fund and Anchor Health Services and/or a representative of Anchor Health Services with regard to the processing of claims involving Grace Radowski.
3. Internal procedures used to process claims submitted to the Calumet Fund for payment including but not limited to denial or acceptance whether in part of each claim made on behalf of Grace Radowski, production of explanation of benefits for the processing of claims made by any medical provider and or health insurer whether private, ERISA or governmental in nature for the period of time from January 1, 2012 through October 31, 2013.
4. Determination as to the status of the Calumet Fund as a primary or secondary payor with regard to the processing of claims involving Grace Radowski.
5. Determination as to the nature of treatment provided to Grace Radowski by the plaintiff Anchor Health Services, Inc.
6. Training given to persons by persons who made decisions regarding items listed above in paragraphs 1 through 5.

The Calumet Fund is also directed to provide documents in support of and relied upon by each witness giving testimony as a designated representatives of Calumet Fund.